



BP Products North America Inc.
Whiting Business Unit
Mail Code 062
2815 Indianapolis Boulevard
Whiting, IN 46394

October 31, 2007

Mr. Tom Easterly
Indiana Department of Environmental Management
Commissioner's Office
100 N Senate Avenue
Indianapolis, IN 46204-2251

RE: CXHO Project – Operation Canadian Crude (OCC)
Source Modification Application
BP Products North America Inc. – Whiting Business Unit

Dear Mr. Easterly:

Please find enclosed the Source Modification Application for the Canadian Extra Heavy Oil (CXHO) Project at the BP Products North America Inc. – Whiting Business Unit (BP). This is a complete revised application for the CXHO Project. BP has submitted a separate letter to you officially withdrawing our previous air permit application for the CXHO project and all related documents and correspondence.

The CXHO project (also known as Operation Canadian Crude (OCC)) will allow the Whiting Refinery to modernize much of the refinery by shutting down some process equipment and replacing other equipment with new equipment. In addition, the Whiting Refinery will substitute Canadian Extra Heavy Oil (CXHO) for a major portion of its existing crude slate. This project will enable BP to decrease its dependence on traditional, less secure, sources of crude oil. By increasing its use of CXHO, BP will enhance U.S. energy security and ensure adequate supplies of gasoline and other fuels in the Midwest.

With the emission controls incorporated into the design of the project and replacing existing technology with more modern, energy efficient equipment, the CXHO project is expected to result in a net emission decrease for all criteria pollutants. When the project is completed in 2011, overall regulated air emissions from the refinery will be below 2006 levels.


The major changes in this permit application include the following:

- No net increase in emissions of any criteria pollutant;
- CO no longer PSD;

- General changes to project design (changes to firing rates, emission factors, number of units (flares and cooling towers combined, some tanks now not being replaced), etc.);
- VOC emissions evaluated based on de minimis test (per 1-hour ozone NSR program) as well as normal evaluation per 8-hour ozone NSR program;
- Including emission increases and decreases from all refinery projects that can be reasonably estimated through 2011, which is the expected end of the contemporaneous period.

If you have any questions concerning the attached application, please feel free to contact Natalie Grimmer at (219) 473-5417.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel J. Sajkowski".

Daniel J. Sajkowski
Whiting Business Unit Leader

Enclosure